

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA, VIRGINIA

<u>In re:</u>	:	
	:	
Victor M. Negron, Jr.	:	CASE NO. 17-10063-KHK
	:	CHAPTER 13
Debtor(s)	:	
	:	

OPPOSITION TO MOTION FOR RELIEF FROM STAY

COMES NOW, Victor M. Negron, Jr., by counsel, and opposes Wells Fargo's Motion for Relief From Stay and in support thereof states as follows:

1. Debtor is currently over \$13,000.00 ahead of schedule on his Chapter 13 Plan payments. Debtor requests leave to file an amended plan to cover the post-petition arrears of \$8,564.52 claimed by Wells Fargo.
2. Debtor's Chapter 13 Plan, after being amended to cover the \$8,564.52, would remain a 100% Plan.

WHEREFORE these premises considered, Debtor requests that this Court deny Wells Fargo's Motion for Relief From Stay, and grant Debtor leave to file an amended plan.

Respectfully submitted,

Victor M. Negron, Jr.
By counsel

/s/ Eric David Kessel
Eric David Kessel, VSB # 42908
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of August, 2017, I served via ECF to authorized users or mailed a true copy of the foregoing Opposition to Motion for Relief From Stay to the following:

Karl Anthony Moses, Jr.
BWW Law Group, LLC
8100 Three Chopt Rd., Suite 240
Richmond, VA 23229
Counsel for Wells Fargo

Thomas P. Gorman, Esq.
Chapter 13 Trustee
300 N. Washington St., Suite 400
Alexandria, VA 22314

____/s/ Eric David Kessel_____
Eric David Kessel